

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

THE ESTATE OF BRIAN COLLINS,
By DAVE LANG, Special Administrator,
BREON JAESHAUN GORDON-COLLINS (A minor),
AJANAE EMANI GORDON-COLLINS (A minor),
BRANDON AESHAUN GORDON-COLLINS (A minor), AND
CAHRON JAYAIR GORDON-COLLINS (A minor),

Case No. 2:21-cv-01438-NJ

Plaintiffs,

v.

MILWAUKEE COUNTY,
C.O. PALMER, LT. ARTUS,
C.O. S. JOHNSON, C.O. DERRICK SPIDELL,
C.O. TABATHA BLOMBERG,
C.O. JEFF ANDRYKOWSKI,
WISCONSIN COUNTY MUTUAL INSURANCE CORPORATION,
ARMOR CORRECTIONAL HEALTH SERVICES, INC.,
N.P. JACQUELINE ALOMEPE,
NURSING SUPERVISOR LYNDA KARASZEWSKI,
R.N. LIANA GRAMZA, DR. JONATHON BRODY,
EVANSTON INSURANCE COMPANY, and
INJURED PATIENTS AND FAMILIES COMPENSATION FUND,
DERRICK SPIDELL, WISCONSIN HEALTH CARE
LIABILITY INSURANCE PLAN, CANDACE DZIEOZIC,

Defendants.

MOTION TO WITHDRAW AS COUNSEL FOR LIANA GRAMZA, RN, ONLY

NOW COMES the undersigned and moves for leave for Corneille Law Group, LLC, to withdraw as counsel for defendant Liana Gramza, RN. The grounds for this motion are as follows:

1. Corneille Law Group, LLC (“CLG”) entered an appearance for defendants Armor Correctional Health Services, Inc., Jacqueline Alomepe, Lynda Karaszewski, and Candace Dzieozic in March 2022 (Docs 21 and 25).

2. CLG also entered an appearance for defendant Liana Gramza RN in February 2023, based on the understanding that Nurse Gramza was employed by Armor Correctional Health Services, Inc., at the times relevant to the lawsuit (Doc 1).
3. It was subsequently learned during discovery that Nurse Gramza was not employed by Armor but rather by FirstMed Staffing, a healthcare professional staffing agency in Pewaukee, Wisconsin.
4. The defense of Nurse Gramza has been tendered to FirstMed Staffing and its insurer, and it is expected that substitute counsel will be retained to appear to defend Gramza in the near future. It is also possible substitute counsel may request some modification to the current scheduling order once he or she appears.
5. CLG requests a short hearing with the court to discuss this motion.

Dated this 22nd day of May 2023.

CORNEILLE LAW GROUP, LLC

s/ Adam M. Fitzpatrick

Adam M. Fitzpatrick

State Bar No. 1098412

David J. Pliner

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*Attorneys for Defendants Armor Correctional
Health Services, Inc., Jacqueline Alomepe, Lynda
Karaszewski, Liana Gramza, and Candace
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